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**In The Matter Of:**

*AGENCY RENT A CAR SYSTEM, INC., v.  
GRAND RENT A CAR CORP*

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JOSEPH V. VITTORIA

*January 22, 1997,  
JANUARY 24, 1997, &  
FEBRUARY 5, 1997*

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Exhibit 31

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*Vittoria - Confidential*

- (1) don't mean differences of opinion or  
(2) disagreements. I mean if we look at the licensee  
(3) standard Avis operation and we lack at your  
(4) corporate locations are they run the same; do  
(5) they rent to the same customers? That's what I'm  
(6) asking.  
(7) A: For the most part, yes.  
(8) Q: What type of locations do the licensee  
(9) locations service?  
(10) A: What type of locations?  
(11) Q: Right. Are they on airport locations?  
(12) A: Most of them are on airport.  
(13) Q: Are there some off airport?  
(14) A: I'm not sure. There might be.  
(15) Q: As you sit here today you're not sure  
(16) whether any of the franchise locations are off  
(17) airport?  
(18) A: Exclusively off airport. They are an  
(19) Avis franchise that does not operate on an  
(20) airport?  
(21) Q: That's not what I was asking.  
(22) A: Okay.  
(23) Q: Do licensees run on airport locations  
(24) and off-airport locations?

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- (1) A: Yes.  
(2) Q: What you're not sure of is whether  
(3) some licensees have only off-airport locations?  
(4) A: Correct.  
(5) Q: Do licensees, some licensees, operate  
(6) downtown or suburban locations?  
(7) A: Yes.  
(8) Q: During the mid-'95 time period again,  
(9) which we went over this morning, do you have a  
(10) sense of what the average age of the Avis fleet  
(11) was at that time? Did you keep statistics like  
(12) that?  
(13) A: We do. My guess, it was probably  
(14) between five and seven months.  
(15) Q: Looking at the licensee operations, do  
(16) you have a sense whether the average age of a  
(17) licensee fleet during that time period varied  
(18) from Avis's, or was it the same?  
(19) A: I don't have that information.  
(20) Q: How did the licensee locations get  
(21) their car rental customers?  
(22) A: For the most part they get it from the  
(23) Avis reservations system, and from the fruits of  
(24) the Avis sales force, and the advertising.

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*Vittoria - Confidential*

- (1) Q: Do they get customers through travel  
(2) agent arrangement?  
(3) A: Yes.  
(4) Q: Do they also get customers through  
(5) calls directly to the local location?  
(6) A: They might.  
(7) Q: Do you know one way or the other?  
(8) A: No.  
(9) Q: Is that data kept at Avis, the source  
(10) of the business at the licensee locations?  
(11) A: I think we have - we should have the  
(12) source through the res center and through the  
(13) travel agencies, if the travel agencies use the  
(14) electronic systems.  
(15) Q: I take it the licensees are required  
(16) to pay certain fees to Avis for the right to be  
(17) the licensees?  
(18) A: Correct.  
(19) Q: What is that fee based on or  
(20) calculated on?  
(21) A: On their revenues.  
(22) Q: Is it referred to as the time and  
(23) mileage?  
(24) A: I believe so.

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*Vittoria - Confidential*

- (1) Q: You testified this morning about the  
(2) efforts by Grand, I believe, or what you knew of  
(3) them to pursue insurance replacement, service  
(4) replacement rentals. Are you aware of any other  
(5) licensees who have, likewise, aggressively  
(6) pursued that area of the market within their  
(7) Avis System location, or Avis licensing location?  
(8) A: I'm not aware of it.  
(9) Q: Are you familiar with a licensee known  
(10) as Kal-Co Rentals, sir, in Michigan?  
(11) A: No.  
(12) Q: Are you familiar with a licensee known  
(13) as Shore Rentals, that operates in New Jersey?  
(14) A: Yes.  
(15) Q: Are you aware that Shore Rentals has,  
(16) as one of its Avis-licensed locations, an  
(17) operation that exists at the service desk of a  
(18) car dealership?  
(19) A: I'm not aware of it.  
(20) Q: Are you familiar with a licensee known  
(21) as Coastal Bend Rent A Car in Texas?  
(22) A: No.  
(23) Q: Are you aware whether licensees place  
(24) Yellow Page ads for their Avis locations?